

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LASHEENA SIPP-LIPSCOMB AND ANDRES GARDIN, SR. Individually and in their own right and as Parents and Natural Guardians of ANDRES GARDIN, JR., a Minor	:	CIVIL NO. 2:20-cv-01926
	:	
Plaintiffs	:	(JUDGE BAYLSON)
	:	
vs.	:	
	:	
EINSTEIN PHYSICIANS PENNYPACK PEDIATRICS, et al	:	(ELECTRONICALLY FILED)
	:	
Defendants	:	


**PROPOSED JURY VERDICT SHEET OF DEFENDANTS,
EINSTEIN PHYSICIANS PENNYPACK PEDIATRICS AND
ALBERT EINSTEIN HEALTHCARE NETWORK**

Defendants, Einstein Physicians Pennypack Pediatrics and Albert Einstein Healthcare Network hereby submit the attached proposed Jury Verdict Sheet.

Defendants reserve the right to supplement the Verdict Sheet, depending upon the evidence presented at trial and any rulings by the Court.

POST & POST LLC

BY: _____


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Date: January 16, 2023

Hayley Bartkus	Yes_____	No_____
Erin Hassel, M.D.	Yes_____	No_____
Pramath Nath, M.D.	Yes_____	No_____
Charles Concodora, M.D.	Yes_____	No_____
Eric Cho, M.D.	Yes_____	No_____
Pennypack Pediatrics	Yes_____	No_____

If you answered Question 2 "No" as to all Defendants you have found to be negligent, you should not answer any further questions and should return to the court room. If you answered "Yes," for both Question 1 and Question 2 for one or more of the Defendants, please go to Question 3.

3. Taking the combined negligence that was a factual cause of any harm to Ag, Jr. as 100 percent, what percentage of that causal negligence was attributable to each of the parties you have found to be causally negligent?

Percentage of causal negligence attributable to Arjun Kalyanpur, M.D.
(Answer only if you have answered "Yes" to Questions 1 and 2 for Defendant, Arjun Kalyanpur, M.D.)

_____ %

Percentage of causal negligence attributable to St. Christopher's Hospital for Children (Answer only if you have answered "Yes" to Questions 1 and 2 for Defendant, St. Christopher's Hospital for Children)

_____ %

Percentage of causal negligence attributable to Hayley Bartkus (Answer only if you have answered "Yes" to Questions 1 and 2 for Defendant, Hayley Bartkus)

_____ %

Percentage of causal negligence attributable to Erin Hassel, M.D. (Answer only if you have answered "Yes" to Questions 1 and 2 for Defendant, Erin Hassel, M.D.)

_____ %

Percentage of causal negligence attributable to Pramath Nath, M.D. (Answer only if you have answered "Yes" to Questions 1 and 2 for Defendant, Pramath Nath, M.D.)

_____ %

Percentage of causal negligence attributable to Charles Concodora, M.D.
(Answer only if you have answered "Yes" to Questions 1 and 2 for Defendant, Charles Concodora, M.D.)

_____ %

Percentage of causal negligence attributable to Eric Cho, M.D. (*Answer only if you have answered "Yes" to Questions 1 and 2 for Defendant, Eric Cho, M.D.*)

_____ %

Percentage of causal negligence attributable to Pennypack Pediatrics (*Answer only if you have answered "Yes" to Questions 1 and 2 for Defendant, Pennypack Pediatrics*)

_____ %

Total 100%

Proceed to Question 4.

4. State the amount of damages, if any, sustained by the Plaintiffs.

\$ _____

Date: _____

FOREPERSON

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in their own right and as Parents and	:	
Natural Guardians of ANDRES GARDIN,	:	
JR., a Minor	:	
Plaintiffs	:	(JUDGE BAYLSON)
vs.	:	
	:	
EINSTEIN PHYSICIANS PENNYPACK	:	(ELECTRONICALLY FILED)
PEDIATRICS, et al	:	
	:	
Defendants	:	

CERTIFICATE OF SERVICE

I, Joseph G. Zack, Esquire, hereby certify that on this 16th day of January, 2023, I caused a true and correct copy of Defendants' Proposed Jury Verdict Sheet to be electronically filed with the Court and available to the following:

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